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16 **UNITED STATES DISTRICT COURT**

17 **DISTRICT OF NEVADA**

18 JENNIFER MIRANDA and PATRICIA  
19 TERRY, on behalf of themselves and all  
20 others similarly situated,

21 Plaintiffs,

22 v.

23 GOLDEN ENTERTAINMENT (NV), INC.,

24 Defendant.

Case No.: 20-cv-00534-JAD-DJA

**STIPULATION AND ~~PROPOSED~~  
ORDER EXTENDING TIME FOR  
DEFENDANT TO RESPOND TO  
PLAINTIFFS' FIRST AMENDED  
COMPLAINT [ECF 24]**

(Second Request)

25 Pursuant to Local Rules IA 6-1 and 7-1, Defendant Golden Entertainment (NV), Inc.  
26 (“Defendant”) and Plaintiffs Jennifer Miranda and Patricia Terry (collectively, “Plaintiffs”),  
27 hereby stipulate, agree, and respectfully request that the Court extend the deadline for Defendant  
28 to answer or otherwise respond to Plaintiffs’ First Amended Complaint from July 30, 2020 to  
August 13, 2020. Good cause exists to grant this Stipulation based on the following facts:

1           1.       On March 16, 2020, Plaintiffs filed their Class Action Complaint and Jury Demand  
2       (“Complaint”) in the United States District Court for the District of Nevada. [ECF 1.]

3           2.       On April 7, 2020, the parties filed a Stipulation and Order Extending Time for  
4       Defendant to Respond to Plaintiffs’ Complaint to allow counsel for Defendant sufficient time to  
5       investigate the case before responding to the Complaint. [ECF 10.]

6           3.       On April 8, 2020, the Court granted the parties’ Stipulation, continuing  
7       Defendants’ responsive pleading deadline to May 8, 2020. [ECF 11.]

8           4.       Thereafter, the parties engaged in settlement negotiations and, to allow the parties  
9       sufficient time to engage in those discussions, continued Defendant’s responsive pleading to June  
10      18, 2020. [See ECF 12, 16-20.]

11          5.       On June 18, 2020, Defendant filed its Motion to Dismiss Plaintiffs’ Complaint.  
12      [ECF 21.]

13          6.       On July 2, 2020, Plaintiffs filed their First Amended Complaint. [ECF 24.] The  
14      First Amended Complaint included additional allegations and causes of action. [See *id.*]

15          7.       After Plaintiffs filed their First Amended Complaint, the parties resumed  
16      settlement negotiations, taking into consideration Plaintiffs’ additional allegations.

17          8.       Defendant’s responsive pleading deadline is currently July 30, 2020. [ECF 27.]

18          9.       The parties need one week to further consider current settlement. If the parties do  
19      not decide to settle, Defendant will need one week to draft and file its Motion to Dismiss.

20          10.      Therefore, Defendant has requested, and Plaintiffs have agreed to, a two-week  
21      extension of Defendant’s deadline to respond to Plaintiffs’ First Amended Complaint to allow the  
22      Parties sufficient time to (1) fully evaluate the Parties latest settlement negotiations and (2) if there  
23      is no settlement, allow Defendant to draft and file its Motion to Dismiss.

24          11.      There will be no further extensions requested by Defendant. Either the parties will  
25      resolve the case and file with the court a Notice of Settlement, including any related briefing  
26      schedule, or Defendant will file its Motion to Dismiss on August 13, 2020.

12. This request is not for the purposes of delay. This is the second request by the parties to extend Defendant's deadline to respond to Plaintiffs' First Amended Complaint.

DATED this 30th day of July, 2020

DATED this 30th day of July, 2020

WOLF, RIFKIN, SHAPIRO, SCHULMAN  
& RABKIN, LLP

GREENBERG TRAURIG, LLP

By: /s/ Don Springmeyer

By: /s/ Mark E. Ferrario

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IT IS SO ORDERED:



Daniel J. Albrects  
United States Magistrate Judge

DATED: July 31, 2020